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Attorneys for Defendant
 CITY OF SAN MATEO

Attorneys for Plaintiffs
 JOHN FINKELSTEIN and
 JENNIFER FINKELSTEIN

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

JOHN FINKELSTEIN, et al.,

 Plaintiffs,

 vs.

 SAN MATEO COUNTY DISTRICT
 ATTORNEY'S OFFICE, et al.,

 Defendants.

Case No. 3:18-cv-00009-EMC

**STIPULATION FOR MODIFICATION OF
 THE DEADLINES ESTABLISHED BY THE
 COURT'S OCTOBER 29, 2020, MINUTE
 ORDER; [PROPOSED] ORDER**

STIPULATION

IT IS HEREBY STIPULATED by and between Plaintiffs John Finkelstein and Jennifer Finkelstein (collectively, "Plaintiffs"), by and through their attorneys of record, and Defendant City of San Mateo by and through their attorneys of record, as follows:

WHEREAS, on October 29, 2020, the Court issued a minute order giving Plaintiffs 90 days (until January 27, 2021) to complete discovery on *Monell* liability (ECF No. 176); and

WHEREAS, the parties have worked diligently to propound and to respond to discovery requests but have been delayed as a result of Covid-related staffing and access issues in completing the necessary

1 discovery; and

2 WHEREAS, production of documents in response to outstanding requests is anticipated by
3 January 11, 2021, following which the parties will meet-and-confer to determine what additional
4 responses, if any, are required, what other discovery should be propounded and whether there are
5 discovery disputes requiring court intervention to resolve; and

6 WHEREAS, after such meet-and-confer processes have been completed it will be possible jointly
7 to formulate a request for specific modifications of the dates set by the Court in its October 29, 2020,
8 Minute Order, Plaintiffs and Defendant City of San Mateo have agreed to request the Court to vacate the
9 dates set in the October 29, 2020, Minute Order (ECF No. 176) and, by January 25, 2021, to stipulate to
10 the Court resetting the dates for events previously set out in the subject minute order.

11 IT IS SO STIPULATED.

12 Dated: January 6, 2021

Respectfully Submitted,
LAW OFFICE OF MARK E. MERIN

13
14 */s/ Mark E. Merin*

15 By: _____
16 Mark E. Merin
17 Attorney for Plaintiffs
18 JOHN FINKELSTEIN and
19 JENNIFER FINKELSTEIN

20 Dated: January 6, 2021

Respectfully Submitted,
LEONE & ALBERTS

21 */s/ Claudia Leed*
(as authorized on January 6, 2021)

22 By: _____
23 Claudia Leed
24 Attorney for Defendant
25 CITY OF SAN MATEO
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27
28

[PROPOSED] ORDER

GOOD CAUSE APPEARING, the parties' stipulation is GRANTED.

The existing deadline to complete discovery on *Monell* liability by January 27, 2021 (ECF No. 176) is VACATED.

Plaintiffs and Defendant City of San Mateo are ORDERED to meet-and-confer and, by January 25, 2021, to submit a stipulation to the Court for resetting the dates for events previously set out in the Court's October 29, 2020, Minute Order (ECF No. 176).

IT IS SO ORDERED.

Dated:

EDWARD M. CHEN
United States District Court Judge